

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**(01) KENNETH R. FRIEND,**  
[DOB: 07-27-1970],

**(02) KENNA M. HARMON,**  
[DOB: 10-23-1978],

**(03) ERIC M. MCCLANAHAN,**  
[DOB: 06-12-1979],

**(04) NELSON OLMEDA,**  
a/k/a "Diego"  
[DOB: 04-01-1990],

**(05) ANTHONY J. VAN PELT,**  
[DOB: 08-12-1978],

**(06) ANTHONY M. MASSONI,**  
[DOB: 11-01-1973],

**(07) ANTHONY A. HATFIELD,**  
[DOB: 12-03-1983],

**(08) CHERYL D. PALUCZAK,**  
[DOB: 03-20-1967],

**(09) MELODY W. CARPENTER,**  
[DOB: 08-15-1982],

**(10) BONNIE L. AMODIO,**  
[DOB: 08-07-1985],

**(11) DONETTE C. DAVIS,**  
[DOB: 12-09-1973],

and

**No. 14-3106-01/12-CR-S-MDH**

**COUNT 1**

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)  
NLT 10 Years Imprisonment  
NMT Life Imprisonment  
NMT \$10 million fine  
NLT 5 Years Supervised Release  
Class A Felony

**COUNTS 2, 3 and 6**

21 U.S.C. § 841(a)(1) and (b)(1)(B)  
NLT 5 Years Imprisonment  
NMT 40 Years Imprisonment  
NMT \$5 million fine  
NLT 4 Years Supervised Release  
Class B Felony

**COUNTS 4, 5, 7, 8 and 9**

21 U.S.C. § 841(a)(1) and (b)(1)(A)  
NLT 10 Years Imprisonment  
NMT Life Imprisonment  
NMT \$10 million fine  
NLT 5 Years Supervised Release  
Class A Felony

**FORFEITURE ALLEGATIONS 1 -6**

21 U.S.C. § 853

\$100 Special Assessment (Each Count)

(12) JOSEPH R. ALLEN  
[DOB: 06-12-1974],

Defendants.

**Defendants/Counts:**

(01) Friend: 1 and FA 2  
(02) Harmon: 1, 7 and FAs 3, 5 and 6  
(03) McClanahan: 1 and 5  
(04) Olmeda: 1, 4 and FA 1  
(05) Van Pelt: 1, 8 and FA 4  
(06) Massoni: 1 and FA 5  
(07) Hatfield: 1 and 6  
(08) Paluczak: 1 and 2  
(09) Carpenter: 1 and 3  
(10) Amodio: 1 and 5  
(11) Davis: 1 and FA 2  
(12) Allen: 1, 9 and FA 6

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT 1**

(Conspiracy to Distribute 500 Grams or More of a Mixture or Substance  
Containing a Detectable Amount of Methamphetamine)  
21 U.S.C. § 841(a)(1) and (b)(1)(B) and § 846

Between December 1, 2013, through November 29, 2014, said dates being approximate, in Greene and Polk Counties, in the Western District of Missouri and elsewhere, the defendants, **KENNETH R. FRIEND, KENNA M. HARMON, ERIC M. MCCLANAHAN, NELSON OLMEDA a/k/a "Diego," ANTHONY J. VAN PELT, ANTHONY M. MASSONI, ANTHONY A. HATFIELD, CHERYL D. PALUCZAK, MELODY W. CARPENTER, BONNIE L. AMODIO, DONETTE C. DAVIS, and JOSEPH R. ALLEN** knowingly and intentionally conspired and agreed with each other and with others, known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing a detectable

amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841 (a)(1) and (b)(1)(A).

**COUNT 2**

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance  
Containing a Detectable Amount of Methamphetamine)  
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about October 15, 2014, in Pulaski County, in the Western District of Missouri and elsewhere, the defendant, **CHERYL D. PALUCZAK**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

**COUNT 3**

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance  
Containing a Detectable Amount of Methamphetamine)  
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about November 3, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **MELODY W. CARPENTER**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

**COUNT 4**

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance  
Containing a Detectable Amount of Methamphetamine)  
21 U.S.C. § 841(a)(1) and (b)(1)(A)

Between November 3, 2014, and November 5, 2014, in Greene and Camden Counties, in the Western District of Missouri and elsewhere, the defendant, **NELSON OLMEDA a/k/a "Diego,"** knowingly and intentionally possessed with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

**COUNT 5**

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance  
Containing a Detectable Amount of Methamphetamine)  
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 6, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendants, **ERIC M. MCCLANAHAN** and **BONNIE L. AMODIO**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

**COUNT 6**

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance  
Containing a Detectable Amount of Methamphetamine)  
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about November 17, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **ANTHONY HATFIELD**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

**COUNT 7**

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance  
Containing a Detectable Amount of Methamphetamine)  
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 27, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNA M. HARMON**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable

amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

**COUNT 8**

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance  
Containing a Detectable Amount of Methamphetamine)  
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 27, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **ANTHONY J. VAN PELT**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

**COUNT 9**

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance  
Containing a Detectable Amount of Methamphetamine)  
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 28, 2014, in Polk County, in the Western District of Missouri and elsewhere, the defendant, **JOSEPH R. ALLEN**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

**FORFEITURE ALLEGATION 1**

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **NELSON OLMEDA a/k/a "Diego,"** shall forfeit to the United States, pursuant to

Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$20,000 and \$1,302 in United States currency seized on November 6, 2014.

### **FORFEITURE ALLEGATION 2**

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **KENNETH R. FRIEND** and **DONETTE C. DAVIS** shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$33,600 and \$710 in United States currency seized on November 27, 2014.
2. A 1992 Harley Davidson Motorcycle, Missouri registration CW-3UA, VIN #1HD1BKL11NY035961, seized on November 27, 2014.

### **FORFEITURE ALLEGATION 3**

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **KENNA M. HARMON**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Real property located at 2250 E. 515<sup>th</sup> Road, Half Way, Polk County, Missouri, with all appurtenances, improvements, and attachments thereon. The legal description of this property is as follows:

Lot C in Way-Forty, a Subdivision in Polk County, Missouri according to the plat recorded in Plat Book 6 at Page 47 of the Polk County Recorder's Office

Parcel ID: 89-16-0.5-15-000-000-005.03;

2. Approximately \$4,604 in United States currency, seized from **HARMON's** vehicle on November 27, 2014;

3. Approximately \$20,000 in United States currency, seized from **HARMON's** property, located at 648 Dana, Republic, Missouri, on November 27, 2014;

4. A 2004 Chevrolet Avalanche, VIN #3GNEK12T84G210528, bearing Missouri registration 1UV432, seized on November 28, 2014. The vehicle is titled in the name of Ruth Ann Gross, **HARMON's** mother, with a Transfer on Death provision to "Grant Kaedin," **HARMON's** son;

5. A 2004 BMW—5 Series, VIN #WBANB33594B113218, seized on November 27, 2014. The vehicle is titled in the name of Ruth Ann Gross, **HARMON**'s mother, with a Transfer on Death provision to "Grant Kayden," **HARMON**'s son;

#### **FORFEITURE ALLEGATION 4**

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **ANTHONY J. VAN PELT**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$23,663 in United States currency seized from **VAN PELT**'s vehicle on November 27, 2014;
2. Approximately \$3,990 in United States currency seized from 1947 S. Missouri, Springfield, Missouri, on November 27, 2014;
3. A 2008 Ford Mustang, VIN #1ZVHT82HX85163052, titled in the name of Pamela Bunn, seized on November 27, 2014.

#### **FORFEITURE ALLEGATION 5**

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.



As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **KENNA M. HARMON** and **ANTHONY M. MASSONI**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$20,000 in United States currency seized on September 4, 2014;
2. Approximately \$37,000 in United States currency seized on December 3, 2014;
3. A 2001 Harley-Davidson motorcycle, VIN #1HD4CJM141K115979; titled in **MASSONI's** name, and seized from Kenna **HARMON's** property in Polk County, Missouri, on November 28, 2014.

#### **FORFEITURE ALLEGATION 6**

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **KENNA M. HARMON** and **JOSEPH R. ALLEN**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. A 2005 Mazda 6 Sedan, VIN #1YVHP80D255M57560, bearing Missouri registration AH9A7S. The vehicle is titled in the name of Joseph R. **ALLEN, HARMON's** brother and has not been seized by law enforcement as of the date of this Indictment;

2. A 1998 Chevrolet Cheyenne Silverado, VIN #1GCEC14M0WZ204365, seized on November 28, 2014. The vehicle is titled in the name of Joseph R. **ALLEN, HARMON's** brother;

3. A 2006 Hyundai Tiberon, VIN #KMHHN65F36U209380, seized on December 2, 2014. The vehicle is titled in the name of Joseph R. **ALLEN, HARMON's** brother.

4. A 1998 Harley-Davidson motorcycle, VIN #1HD4CAM1XWY216075, seized on November 28, 2014. The vehicle was titled in the name of Joseph R. **ALLEN, HARMON's** brother.

5. Approximately \$5,107 in United States currency, seized from Classic Storage, 4375 N. Farm Road 185, Unit 238, Springfield, Missouri, on December 2, 2014.

A TRUE BILL

/s/  
FOREPERSON OF THE GRAND JURY

/s/ Gary K. Milligan  
Gary Milligan  
Assistant United States Attorney

DATED: 12/10/2014  
Springfield, Missouri